

1983 Form

CV-16-K-1326-S

In the United States District Court  
For the Northern District of Alabama

FILED

2016 AUG 15 P 12:17

U.S. DISTRICT COURT  
N.D. OF ALABAMA

QUENTIN TRUSS #181630

(Enter above the full name(s) of the  
plaintiff(s) in this action)

LATASHA TERRELL, ET AL.

(Enter above full name(s) of the  
defendant(s) in this action)

I. Previous lawsuits

- A. Have you begun other lawsuits in state or federal court(s) dealing with the same facts involved in this action or otherwise relating to your imprisonment? Yes ( ) No ☒
- B. If your answer to A. is "yes", describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuit(s) on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit

Plaintiff(s): \_\_\_\_\_

Defendant(s) \_\_\_\_\_

2. Court (if Federal Court, name the district; if State Court, name the county)

\_\_\_\_\_

3. Docket Number \_\_\_\_\_

4. Name of judge to whom case was assigned \_\_\_\_\_

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

\_\_\_\_\_

\_\_\_\_\_

6. Approximate date of filing lawsuit \_\_\_\_\_

7. Approximate date of disposition \_\_\_\_\_

II. Place of present confinement WILLIAM E. DONALDSON CORRECTION FACILITY

A. Is there a prisoner grievance procedure in this institution?

Yes ( ) No ☒

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes ( ) No ( )

C. If your answer is YES:

1. What steps did you take? \_\_\_\_\_

\_\_\_\_\_

2. What was the result? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

D. If your answer is NO, explain why not? ALABAMA DEPARTMENT OF CORRECTIONS  
DOESNT HAVE GRIEVANCE PROCEDURE FOR INMATES. BUT I  
WROTE LETTERS OF COMPLAINT TO PRISON OFFICIAL AND COM-  
MISSIONER OFFICES ON APRIL 17, APRIL 29, SEPT 1, SEPT 9, OCT 8 2015  
DETAILING FACTS (EXHIBIT A, B, C, D, E)

III. Parties

In item A below, place your name(s) in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.

A. Name of plaintiff(s) QUENTIN TRUSS #181630

\_\_\_\_\_

\_\_\_\_\_

Address WILLIAM E. DONALDSON CORRECTIONAL FACILITY 100 WARREN AVE  
BESSEMER, ALABAMA 35023

In item B. below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use item C for the names, positions, and places of employment of any additional defendants.

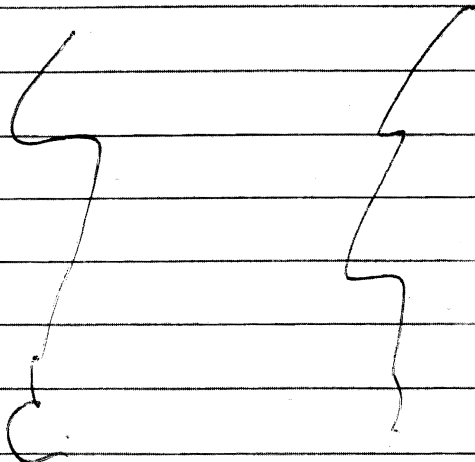
B. Defendant LATASHA TERRELL  
 is employed as CORRECTIONAL OFFICER  
 at WILLIAM E. DONALDSON CORRECTIONAL FACILITY 100 WARRIOR LAKE BESSEMER, ALABAMA 35023

C. Additional Defendants CO. G. HAMMOND, CO. S. TUNSTALL, CO. T. TURBULL, C.O. D. FREEMAN, CO. MARSH, CO. REYNOLDS, SGT M. JENKINS, LT. C. PETERSON  
WARDEN C. SPEARS AT ALL TIMES RELEVANT TO THE EVENTS DESCRIBE HEREIN  
DEFENDANTS WERE EMPLOYED AND ACTED UNDER COLOR OF LAW OF THE STATE OF ALABAMA

#### IV. Statement of Claim

State here, as briefly as possible, the FACTS of your case. Describe how each defendant is involved. Include, also, the names of other persons involved, dates and places. *Do not give any legal arguments or cite any cases or statutes.* If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet, if necessary.

ATTACH BACK



ATTACH BACK

V. RELIEF

State briefly *exactly* what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

GRANTING PLAINTIFF TRUSS A DECLARATION THAT THE ACTS AND COMMISSIONS  
DESCRIBED HEREIN VIOLATE HIS RIGHTS UNDER THE CONSTITUTION AND LAWS OF THE  
UNITED STATES. A PRELIMINARY AND PERMANENT INJUNCTION ORDERING DEFENDANTS  
TERRELL, HAYWOOD, TURNER, TOWELL TO CEASE THEIR VIOLENCE TO PLAINTIFF  
AND TRANSFER HIM. GRANT PLAINTIFF TRUSS COMPENSATORY AND PUNITIVE  
DAMAGES IN THE AMOUNT OF 25,000 AGAINST EACH DEFENDANTS JOINTLY  
AND SEVERALLY. PLAINTIFF ALSO SEeks A JURY TRIAL ON ALL ISSUES TRIABLE BY JURY  
ALSO SEeks RECOVERY OF COURT COST IN THIS SUIT

"I declare under penalty of perjury that the foregoing is true and correct.

Executed on 8-11-16  
(date)

Quentin Truss #181630  
Signature(s)

## VI. FACTS

1. ON APRIL 16, 2015, DEFENDANT J. TUNSTALL APPROACH THE PLAINTIFF ON THE SPORT BENCH ON X-SIDE, IN X-Y DORMITORY. DEFENDANT TUNSTALL TOLD PLAINTIFF THAT OFFICER TERRELL WANT HIM IN THE X-Y CORRIDOR. ONCE PLAINTIFF TRUSS ENTER THE CORRIDOR THEIR WERE SEVERALLY OFFICERS WAIT ON HIM WHEN X-SIDE DOOR CLOSE BEHIND HIM WITHOUT A SUPERVISOR. DEFENDANT T. TURNBULL WAS STANDING BEHIND THE DOOR TO PLAINTIFF LEFT WITH OFFICER MARKS LEAN ON THE WALL. OFFICER GREGOREE HAYWOOD WAS STANDING IN FRONT OF THE PLAINTIFF WITH OFFICER J. TUNSTALL BEHIND HER. DEFENDANT LATASHA TERRELL WAS COMING DOWN THE CORRIDOR TO JOIN THE OTHER OFFICER AFTER SHE LET TRADE SCHOOL AND A.B.E OUT THE CORRIDOR FROM RIGHT. DEFENDANT DANA FREEMAN CAME OUT THE X-Y CUBILE DOOR AND STOOD BESIDE OFFICER MARKS AND ASK THE PLAINTIFF TO LOOK AT HER. OFFICER HAYWOOD TOLD ME TO TAKE OFF MY SKULLCAP TO BE IDENTIFY BY OFFICER FREEMAN (CADET) WHO STATED "HE'S THE BITCH ASSES NIGGER" WHO DISRESPECT HER. OFFICER HAYWOOD ASK PLAINTIFF WHY I DISRESPECT HER OFFICER AND PUNCH THE PLAINTIFF IN THE FACE. THEN CAME OFFICERS T. TURNBULL, T. TERRELL, J. TUNSTALL ALL START PUNCH AND HIT THE PLAINTIFF ALL OVER HIS UPPER BODY. PLAINTIFF TRUSS BROKE AWAY FROM THE OFFICERS START WALKING BACKWARD UP THE CORRIDOR WHILE OFFICER TURNBULL AND OFFICER TUNSTALL START HIT PLAINTIFF WITH THE BATONS ON THE LEGS. OFFICER HAYWOOD GOT FRUSTATED BECAUSE PLAINTIFF WOULDN'T BE STILL AND PULL OUT HER MACE START SPRAYING ALONG WITH OFFICER TERRELL AND TURNBULL PUT HER BATON UP. OFFICER MARKS PANIC GOT CADET FREEMAN WHO WAS THE CUBILE OFFICER TO OPEN THE FRONT DOOR IN THE CORRIDOR THAT GOES TO THE

MAIN HALLWAY, FOR SHE COULD LEAVE THE SCENE BEFORE CODE RED BE CALLED, BEING OFF HER ASSIGN POST. CADET FREEMAN OPEN THE FRONT DOOR FOR OFFICER MARKS BECAUSE SHE WAS AFRAID BY SITUATION GOT OUT HAND WITHOUT A SUPERVISOR PRESENCE. OFFICER TURNBULL AN OFFICER HAYWOOD WAS OFF THEIR ASSIGN POST ALSO. OFFICER TERRELL AN TUNSTALL WAS ASSIGN THAT ~~DE~~ WHY DEFENDANT TERRELL WROTE DISCIPLINARY REPORT. THE PLAINTIFF RAN OUT THE CORRIDOR BEHIND OFFICER MARKS TO ESCAPE THE "AMBUSH" AN WAS LOSING MY VISION TO SEE. CADET FREEMAN GOT SCARED AFTER PLAINTIFF RUN OUT THE CORRIDOR AN CALL THE CODE RED WHERE ALL OFFICER AN SUPERVISOR MUST RESPONSE. CADET FREEMAN MADE THE CALL OUT CUBICLE INSTEAD OF THE DEFENDANTS ATTACKING THE PLAINTIFF ON THE FLOOR WHO USE EXCESSIVE FORCE WITH MACES AND BATONS. (EXHIBIT A.B.) THE CODE RED PUT THE PLAINTIFF ON THE GROUND IN FRONT OF THE INFIRMARY. AN OFFICER TERRELL AN HAYWOOD CAME UP AN KICK PLAINTIFF LAYING ON GROUND WITH HANDCUFFS ON FROM THE BACK. ONCE IN THE INFIRMARY THE PLAINTIFF WAS PUT IN THE SHOWER BY OFFICER CLARK FOR ABOUT THREE MINUTES.

2. WARDEN SPECKS MADE OFFICER CLARK TAKE ME OUT THE SHOWER WITHOUT ADEQUATE DECONTAMINATION FOR MY EYES. DEFENDANT SPECKS USE HIS SUPERVISOR POSITION TO INTIMIDATE NURSE GREEN DURING THE BODY CHART. WOULDNT ALLOW HIM TO DO A THOROUGHLY LOW-BODY EXAMINATION ON THE PLAINTIFF. LEAVING A INJURY TO THE RIGHT UPPER THIGH THAT TOOK TWO WEEK TO GET ADEQUATE MEDICAL ASSISTING. (CHECK MEDICAL RECORD) L.T OTIS PETERSON WAS THE SECOND LEADING INVESTIGATOR IN THE INCIDENT ON THE 16<sup>th</sup> OF APRIL

2015, "DENIED THE PLAINTIFF A USE OF FORCE STATEMENT" AFTER TRUSS WAS MADES AN BEATING WITH BATON DURING THE INCIDENT. ON THE 29<sup>TH</sup> OF APRIL 2015, SGT M. JENKINS HELP COVER-UP "EXCESSIVE FORCE", BY ORCHESTRATING THE PLAINTIFF TRUSS WITH A BOGUS DISCIPLINARY REPORT USE HIS SUPERVISOR POSITION. THAT NEVER HAPPEN IN X-Y CORRIDOR AGAINST CADET FREEMAN, (EXHIBIT F) (FOUND NOT GUILTY) DEFENDANT JENKINS WAS THE HEARING OFFICER IN DISCIPLINARY PROCEDURAL AGAINST THE PLAINTIFF AN OFFICER TERRELL ON 29<sup>TH</sup> OF APRIL 2015. USING HIS POSITION AFTER PLAINTIFF ASK A QUESTION DURING HEARING AND CAME BACK A DAY LATER AN WROTE ANOTHER DISCIPLINARY REPORT BEING BAISE, (EXHIBIT G) (QUESTION) WARDEN SPECKS WAS BEING VINDICTIVE AN BAISE AFTER INVESTIGATION TOOK PLACES FROM THE INCIDENT ON APRIL 16, 2015, FINDING OUT DEFENDANT TERRELL HAD LIED TO HER SUPERVISOR ABOUT BEING ALONE IN X-Y CORRIDOR WITH THE PLAINTIFF TRUSS ALLEGE ASSAULTING HER. WARDEN SPECKS FOUND PLAINTIFF GUILTY MAY 1, 2015 AFTER FINDING OUT EXCESSIVE FORCE WAS USE AN THREE CANS OF MACEs ALMOST EMPTY BESIDE ALL THE OTHER OFFICERS WAS CALL TO COVERED BY WARDEN C. PRICE. SPECK HAD KNOWLEDGE OF BOTH INCIDENT WHEN OFFICER TERRELL HAD FIVE OTHER OFFICER PRESENCE. (EXHIBIT G) (QUESTION & ANSWER)

3. ON THE 28<sup>TH</sup> OF AUGUST 2015, OFFICER R. EVANS THREATENING TO USE RETALIZATION AGAINST THE PLAINTIFF TRUSS IN SEGREGATION UNIT DURING SHOWER, CLAIM THAT TRUSS ATTACK HIS CO-WORKER DEFENDANT TERRELL WHO A FEMALE OFFICER. (EXHIBIT C-D) ON THE 3<sup>RD</sup> OF SEPTEMBER 2015, DEFENDANT EVANS CAME TO MY CELL DURING PTU CALL TOLD PLAINTIFF TRUSS "HE MY WORST NIGHTMARE"

AFTER HE MADE ALL TYPE OF SEXUALLY REMARKS DAYS EARLY, I'M STILL IN SEGREGATION TO THIS DAY ~~HE~~ STILL HARASSING ME, (ENHIBIT E.)

## V. LEGAL CLAIMS

1. DEFENDANT LATANJA TERRELL WAS THE RING LEADER WHO USED EXCESSIVE FORCE AGAINST PLAINTIFF TRUSS BY PUNCH HIM, SPRAYING HIM WITH MACES WHEN TRUSS WASN'T VIOLATING ANY PRISON RULE OR ACTING DISRUPTIVELY. OFFICER TERRELL ACTION WAS PLAIN MALICIOUS & SADIST EVIL ACT VIOLATING (S.O.P) STANDARD OPERATING PROCEDURAL BY NOT NOTIFY A SUPERVISOR. VIOLATING PLAINTIFF TRUSS RIGHTS FOR EXCESSIVE FORCE DELIBERATE INDIFFERENCE UNDER EIGHTH AMENDMENT TO THE UNITED STATES CONSTITUTION AND CAUSE TRUSS PAIN, SUFFERING, PHYSICAL INJURY AND EMOTIONAL DISTRESS.
2. DEFENDANT GREGOREE HAYWOOD STARTED THE EXCESSIVE FORCE AGAINST PLAINTIFF TRUSS BY PUNCH HIM IN THE FACE AND SPRAYING HIM WITH MACES WHEN TRUSS WASN'T VIOLATING ANY PRISON RULE OR ACTING DISRUPTIVELY. OFFICER HAYWOOD ACTION WAS MALICIOUS AND SADIST EVIL ACT TO PLAINTIFF TRUSS ALSO VIOLATING (S.O.P) STANDARD OPERATING PROCEDURAL BY BEING OFF HER ASSIGNED POST HER ACTION WAS UNPROFESSIONAL. VIOLATING PLAINTIFF TRUSS RIGHTS UNDER EIGHTH AMENDMENT FOR EXCESSIVE FORCE DELIBERATE INDIFFERENCE TO THE UNITED STATES CONSTITUTION, CAUSING PLAINTIFF TRUSS PAIN, SUFFERING, PHYSICAL INJURY AND EMOTIONAL DISTRESS.
3. DEFENDANT T. TURNBULL USED EXCESSIVE FORCE AGAINST PLAINTIFF TRUSS BY PUNCH HIM AND HIT WITH BATON, SPRAYING MACES IN HIS FACE. WHEN TRUSS WASN'T

VIOLATING ANY PRISON RULE OR ACTING DISRUPTIVELY. OFFICER TURNBULL ACTION WAS MALICIOUS AND SADIST EVIL ACT TO TRUSS VIOLATING (S.O.P.) STANDARD OPERATING PROCEDURAL BY BEING OFF ASSIGN POST DEFENDANT TURNBULL ACTION VIOLATED PLAINTIFF TRUSS RIGHTS FOR EXCESSIVE FORCE DELIBERATE INDIFFERENCE UNDER EIGHTH AMENDMENT TO THE UNITED STATES CONSTITUTION, CAUSED TRUSS PAIN, SUFFERING, PHYSICAL INJURY AND EMOTIONAL DISTRESS.

4. DEFENDANT J. TUNSTALL USED EXCESSIVE FORCE AGAINST THE PLAINTIFF TRUSS BY LURE HIM IN X-Y CORRIDOR WHERE NOBODY COULD WITNESS THE BRUTALITY BY SEVERAL OFFICERS. DEFENDANT TUNSTALL HIT PLAINTIFF WITH THE BATON AND PUNCH HIM REPEATLY WHEN TRUSS WASN'T VIOLATING ANY PRISON RULE OR ACTING DISRUPTIVELY. OFFICER TUNSTALL ACTION WAS MALICIOUS AND SADIST EVIL ACT, VIOLATING (S.O.P.) STANDARD OPERATING PROCEDURAL NOT NOTIFY SUPERVISOR DURING A DISAGREE WITH INMATE VIOLATING TRUSS RIGHTS FOR EXCESSIVE FORCE DELIBERATE INDIFFERENCE UNDER EIGHTH AMENDMENT TO THE UNITED STATES CONSTITUTION, CAUSED TRUSS PAIN, SUFFERING, PHYSICAL INJURY AND EMOTIONAL DISTRESS.

5. DEFENDANT MARKS WHO ~~RESIGN~~ WAS A OFFICER WHO DIDN'T STOP HER CO-WORKERS FROM USING EXCESSIVE FORCE AGAINST PLAINTIFF TRUSS OFFICER MARKS ACTION WAS NON-FEASANCE AND WAS PRESENCE VIOLATING TRUSS RIGHTS UNDER EIGHTH AMENDMENT FOR DELIBERATE INDIFFERENCE TO THE UNITED STATES CONSTITUTION CAUSING TRUSS PAIN, SUFFERING, PHYSICAL INJURY AND

## EMOTIONAL DISTRESS.

6. DEFENDANT DANA FREEMAN WAS A PART OF THE OFFICERS WHO USED EXCESSIVE FORCE AGAINST PLAINTIFF TRUSS IN X-Y CORRIDOR. OFFICER FREEMAN ACTION WAS NON-FEASANCE, BUT SHE DIDNT TRY TO STOP HER CO-WORKER PERIOD FROM ATTACHING THE PLAINTIFF, VIOLATING PLAINTIFF TRUSS RIGHTS FOR EXCESSIVE FORCE DELIBERATE INDIFFERENCE UNDER EIGHTH AMENDMENT TO THE UNITED STATES CONSTITUTION, CAUSING TRUSS PAIN, SUFFERING, PHYSICAL INJURY AND EMOTIONAL DISTRESS.

7. DEFENDANT OTIS PETERSON WAS THE LEADING SHIFT SUPERVISOR WHEN THIS EXCESSIVE FORCE TOOK PLACE AGAINST PLAINTIFF TRUSS. LT. PETERSON WAS BAISE WHEN HE HELP COVER-UP "EXCESSIVE FORCE" DENIED TRUSS A "USE OF FORCE STATEMENT". BECAUSE HE WAS RESPONSIBLE FOR HIS SHIFT AN OFFICERS VIOLATING PLAINTIFF TRUSS DUE PROCESS RIGHTS TO A FAIR INVESTIGATION. LTO PETERSON VIOLATED TRUSS RIGHTS FOR EXCESSIVE FORCE DELIBERATE INDIFFERENCE UNDER EIGHTH AMENDMENT RIGHTS & DUE PROCESS, EQUAL PROTECTION, DISCRIMINATION UNDER FOURTEENTH AMENDMENT RIGHTS TO THE UNITED STATES CONSTITUTION, CAUSING PLAINTIFF TRUSS PAIN, SUFFERING, PHYSICAL INJURY AND EMOTIONAL DISTRESS.

8. DEFENDANT CEDRICK SPECKS WAS THE WARDEN AT THIS PRISON WHEN THE INCIDENT TOOK PLACE. AN HE IT LEGALLY RESPONSIBLE FOR THE WELFARE AN OPERATION TO PLAINTIFF TRUSS AND ALL THE DEFENDANTS THAT WHO WAS INVOLVE USING EXCESSIVE FORCE AGAINST TRUSS.

WARDEN SPECKS IT LIABLE FOR THE ACTIONS THAT WAS HARMFUL TO THE PLAINTIFF, AND HELP COVER-UP THE ABUSE THAT TRUSS SUFFERING ONCE HE WERE BROUGHT TO THE INFIRMARY. WARDEN SPECKS WAS RAISE USING FORCEFUL MEAN OF CONTROL, WOULDNT ALLOW NURSE GREEN TO DECONTAMINATION TO PLAINTIFF EYES AFTER BEING MACES. HE WOULDNT ALLOW NURSE GREEN TO DO A LOW-BODY EXAMINATION DURING THE BODY CHART AFTER PLAINTIFF WAS BEATING BY SEVERAL OFFICERS WITH BATON. DEFENDANT SPECKS IT'S LEGALLY LIABLE AN FAIL IN HIS SUPERVISOR DUTIES TO PROTECT TRUSS TO FAIR TREATMENT OF HIS HEALTH. WARDEN SPECKS VIOLATED TRUSS RIGHTS FOR EXCESSIVE FORCE DELIBERATE INDIFFERENCE UNDER EIGHTH AMENDMENT RIGHTS & DUE PROCESS, EQUAL PROTECTION AN DISCRIMINATION UNDER THE FOURTEENTH AMENDMENT RIGHTS TO THE UNITED STATES CONSTITUTION, CAUSING PLAINTIFF TRUSS PAIN, SUFFERING, PHYSICAL INJURY AN EMOTIONAL DISTRESS.

9. ON THE 29<sup>TH</sup> OF APRIL 2015, DEFENDANT M. JENKINS WAS THE HEARING OFFICER FOR ASSAULTED CHARGE AGAINST PLAINTIFF TRUSS. FROM INCIDENT OFFICER TERRELL WROTE TRYING TO COVERUP EXCESSIVE FORCE DURING DISCIPLINARY PROCEDURAL. DEFENDANT TERRELL TOLD SGT JENKINS THAT SHE DIDNT HAVE NO PHYSICAL INJURY AFTER INCIDENT, AN THAT OFFICER TUNSTALL WASNT PRESENCE DURING THE INCIDENT. (EXHIBIT G) ONE OF THE WRITING QUESTION WAS ASK WHY WERE PLAINTIFF BRING TO X-Y CORRIDOR. SHE SAID SOMEONE POINT OUT TRUSS BUT NEVER SAID WHO WAS THAT SOMEONE THAT ALLEGE DISRESPECT CAPT FREEMAN. SGT M. JENKINS USE THAT QUESTION BEING RAISE TO COVER-UP EXCESSIVE FORCE AND APPROVE CHARGE OF ASSAULTED. THEN CAME BACK WROTE PLAINTIFF ANOTHER ROGUS DISCIPLINARY REPORT, THAT WERE FOUND NOT GUILTY DUE TO MISMANAGEMENT ON SGT JENKIN BEHALF. (EXHIBIT F) (DISCIPLINARY REPORT DO GOOD) SGT JENKIN WAS RAISE

AND LIABLE IN HIS SUPERVISORY DUTIES TO BE FAIR VIOLATING PLAINTIFF TRUSS RIGHTS UNDER EXCESSIVE FORCE DELIBERATE INDIFFERENCE EIGHTH AMENDMENT RIGHTS & DUE PROCESS, EQUAL PROTECTION, DISCRIMINATION UNDER FOURTEENTH AMENDMENT RIGHTS TO THE UNITED STATES CONSTITUTION, CAUSING TRUSS PAIN, SUFFERING, PHYSICAL INJURY AND EMOTIONAL DISTRESS.

10. ON THE 1<sup>ST</sup> OF MAY 2015, DEFENDANT CEDRICK SPECKS WAS BAISE TO PLAINTIFF TRUSS USE HIS WARDEN POSITION TO FIND TRUSS GUILTY IN DISCIPLINARY REPORT. WARDEN SPECKS COVER-UP EXCESSIVE FORCE AFTER WARDEN C. PRICE INTERROGATED DEFENDANT TERRELL FOR MISCONDUCT CHARGE FOR LYING TO HER SUPERVISOR BY BEING ALONE. WHEN THIS INCIDENT HAPPEN ON THE 16<sup>TH</sup> OF APRIL 2015 WITH TWO OTHER OFFICERS USE EXCESSIVE MACE ON TRUSS ALMOST EMPTY THE CANS. WHEN NO OTHER OFFICERS SPRAY MACE PERIOD AND WARDEN SPECKS HAD KNOWLEDGE OF BOTH INVESTIGATION. DEFENDANT SPECKS FAIL IN HIS SUPERVORY DUTIES TO PROTECT PLAINTIFF TRUSS DUE PROCESS RIGHTS AND FOUND HIM GUILTY ON THE CHARGE DISCRIMINATING AGAINST TRUSS. VIOLATING HIS OWN STANDARD OPERATING PROCEDURAL AGAINST PLAINTIFF RIGHTS WAS VIOLATED FOR DELIBERATE INDIFFERENCE EXCESSIVE FORCE UNDER THE EIGHTH AMENDMENT RIGHTS & DUE PROCESS AND EQUAL PROTECTION, DISCRIMINATION UNDER FOURTEENTH AMENDMENT TO THE UNITED STATES CONSTITUTION, CAUSING TRUSS PAIN, SUFFERING, PHYSICAL INJURY AND EMOTIONAL DISTRESS.

11. DEFENDANT R. EVANS USE HARASSEMENT AND MADE

SEXUALLY OFFENSE REMARKS TOWARD PLAINTIFF TRUSS IN SEGREGATION UNIT AFTER EXCESSIVE FORCE WAS USE FOUR MONTH EARLY, DEFENDING OFFICER TERRELL STATED THAT SHE WAS A FEMALE HIS CO-WORKER, USING RETALIATION AND THREATS TOWARD PLAINTIFF TRUSS, CONSTANTLY VIOLATING PLAINTIFF RIGHTS EVERY TIME HE WORK IN SEGREGATION AROUND ME, I HAVE WROTE SEVERALLY COMPLAINT BY LETTERS TO OFFICIAL AND NEVER GOT A RESPONSES BACK OR CHANGE IN HIS SCHEDULE TO THIS DAY WHERE I'M IN SEGREGATION RIGHT NOW, (EXHIBIT D-E) OFFICER EVANS HAS VIOLATED TRUSS RIGHTS FOR DELIBERATE INDIFFERENCE CRUEL AND UNUSUAL PUNISHMENT UNDER EIGHTH AMENDMENT RIGHTS TO THE UNITED STATES CONSTITUTION, CAUSING PLAINTIFF TRUSS PAIN SUFFERING AND EMOTIONAL DISTRESS,